

US EPA RECORDS CENTER REGION 5



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**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**ALCAN ROLLED PRODUCTS COMPANY
(FORMERLY ALCAN SHEET AND PLATE)
WARREN, OHIO
OHD 004 457 222**

FINAL REPORT

*Low
Priority*

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

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EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and one other area of concern (AOC) at the Alcan Rolled Products Company, formerly Alcan Sheet and Plate (Alcan), facility in Warren, Trumbull County, Ohio. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from the SWMUs and AOC identified.

The Alcan facility currently conducts secondary aluminum coil coating operations, primarily for the aluminum can industry. The facility currently employs about 80 people in a mixed-use industrial and residential area.

The Alcan facility is a division of Alcan Aluminum Corporation, a wholly-owned subsidiary of Alcan Aluminum Limited of Montreal, Quebec, Canada. In approximately 1965, Alcan began operations at the facility as Alcan Sheet and Plate. Past facility operations also included cold rolling and annealing of aluminum. These operations were discontinued in about 1986. Prior to 1965, the Bridgeport Brass Company and National Distillers conducted similar operations at the facility. According to facility representatives, the facility was originally built in about 1914 and was operated by the U.S. Navy. Further details regarding past facility operations were not available.

Currently, the following wastes are routinely generated at the facility: waste paint, waste solvent, and waste solvent-soaked rags (F003, F005, D001, and D035); chromic acid sludge (D002 and D007); waste carbon tetrachloride (F001); wastewater treatment sludge (F019); and nonhazardous wastewaters, wax coatings, aluminum sheet cleaning residue, and used oil. These wastes are ultimately shipped off site for treatment or disposal.

In November 1980, the facility submitted a Part A Permit Application. This application listed container storage (S01) at one area, the Container Storage Area (SWMU 3). In June 1983, Alcan submitted a closure plan to OEPA and requested the removal of its status as a storage facility. No sampling activities were specified in the facility closure plan. In September 1984, EPA acknowledged Alcan's change in status to a generator only. OEPA acknowledged Alcan's status change in April 1985.

The PA/VSI identified the following seven SWMUs and one AOC at the facility:

Solid Waste Management Units

1. Storage Building 21
2. Hazardous Waste Storage Pad
3. Container Storage Area
4. Sludge Roll-Off Box
5. Wastewater Treatment System
6. Satellite Accumulation Areas
7. Used Oil Storage Tank

Area of Concern

1. Solvent Underground Storage Tank (UST)

According to facility representatives, Alcan released 300 gallons of roll coolant, a kerosene-based oil used during cold rolling operations, to the city sewer on May 17, 1984. This release was reported to the city. No further action was taken, and no citations were issued regarding this release. Cold rolling operations at the facility were discontinued in about 1986. PRC found no other documentation of releases to environmental media at the Alcan facility.

Because facility SWMUs are either inactive, manage nonhazardous wastes, are located indoors, or are equipped with adequate secondary containment to control future releases, the potential for release to all environmental media is low.

Receptors of potential releases include Alcan facility personnel and residents of Warren, Ohio. The nearest residence is located within 0.5 mile of the facility. Facility access is limited by a 6-foot, chain-link fence with three strands of barbed wire. This fence surrounds the facility, except along the northeast portion of the facility where the facility's Main Building abuts the property edge. The nearest schools are located between 0.5 and 1 mile from the facility.

The Mahoning River is located about 0.75 mile west of Alcan and is the surface water body nearest to the facility. The Mahoning River is used for industrial and recreational purposes and flows southwest to Mosquito Creek. Mosquito Creek is located about 2.5 miles from the facility at its nearest point and originates at Mosquito Creek Lake. Surface water from Mosquito Creek Lake is used as the primary source of drinking water for the city of Warren. This lake is located about 4 miles northeast of Alcan.

Ground water is not used as the primary source of drinking water for the area. However, some private wells are located in the area. The nearest drinking water well is located between 0.75 and 1 mile from the facility. This well is located upgradient of the facility.

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Sensitive environments are not located on site. However, wetland areas are located within 1 mile of the facility.

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PRC recommends that removal of the facility's Solvent UST (AOC 1) continue as scheduled under the supervision of the local fire marshall. This UST stored product solvent, primarily methyl ethyl ketone (MEK), and has a capacity of 5,000 gallons. At the time of the VSI, the removal was scheduled for late 1992. Soil sampling may also be required to determine the extent of any contamination that exists at this AOC. PRC recommends no further action at any of the facility's SWMUs.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI conducted at the Alcan Rolled Products Company, formerly Alcan Sheet and Plate (Alcan), facility (EPA Identification No. OHD 004 457 222) in Warren, Trumbull County, Ohio. The PA was completed on October 13, 1992. PRC gathered and reviewed information from the Ohio Environmental Protection Agency (OEPA) and from EPA Region 5 RCRA files. The VSI was conducted on October 27, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. PRC identified seven SWMUs and one AOC at the facility.

The VSI is summarized and 14 inspection photographs are included in Attachment A. Field notes from the VSI are included in Attachment B.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; a history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

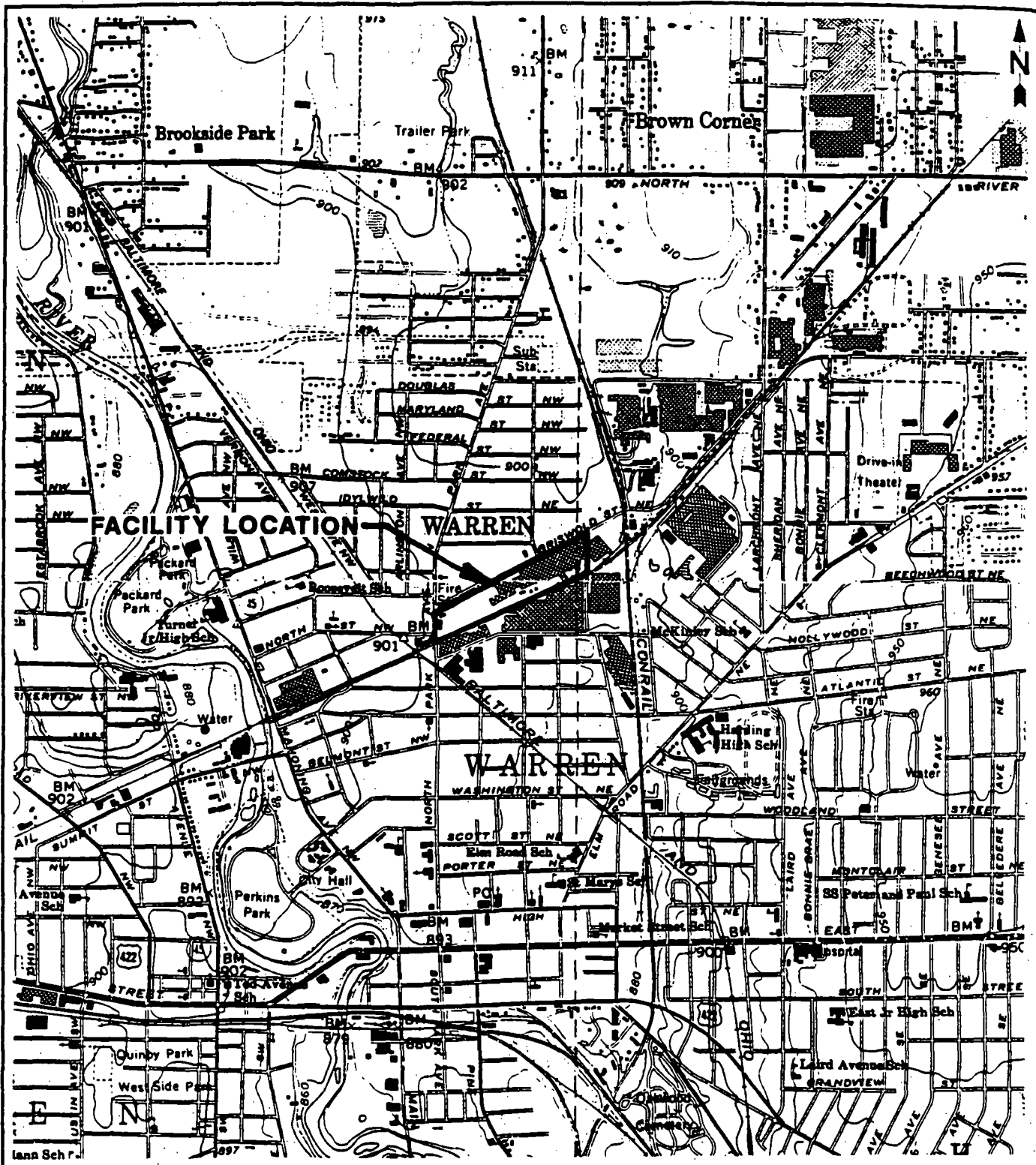
The Alcan facility is located at 390 Griswold Street NE in Warren, Trumbull County, Ohio (latitude 80°48'45" N; longitude 41°15'00" W) (Alcan, 1980b). The facility occupies about 26.5 acres in a mixed-use industrial and residential area. The location of the Alcan facility is shown in Figure 1.

Alcan is bordered on the north by a commercial and residential area across Griswold Street NE; on the east by the Packard Electric facility across Paige Avenue; on the south by the General Electric and Packard Electric facilities across the Conrail railroad tracks; and on the west by property leased from Alcan to the Erieview Cartage Trucking Company, and a commercial area across North Park Avenue. No solid wastes are managed by the Erieview Cartage Trucking Company (PRC, 1992c).

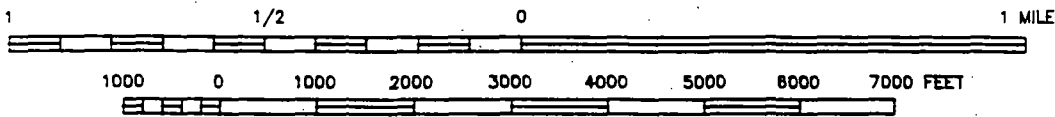
Facility access is limited by a 6-foot, chain-link fence with three strands of barbed wire. Facility access is also monitored by security guards. This fence surrounds the facility, except along the northeast portion of the facility where the facility's Main Building abuts the property edge along Griswold Street NE and Paige Avenue.

2.2 FACILITY OPERATIONS

The Alcan facility currently conducts secondary aluminum coil coating operations, primarily for the aluminum can industry. Alcan receives coils of aluminum from off site. The following activities are associated with secondary aluminum coil coating operations: (1) uncoiling and leveling; (2) washing or pretreating with a chrome phosphate solution in dip tanks; (3) coating with a solvent-based paint that is baked onto the aluminum; (4) lubricating with a nonhazardous, petroleum-based lubricant; (5) slitting to remove edges or to finish the coil to customer specifications; and (6) recoiling. The facility recently installed pilot Aluminum Vehicle Technology (AVT) operations used to clean or pretreat aluminum coils prior to shipping them off site for painting. AVT operations are used primarily to treat aluminum for the automotive industry and include cleaning coils of aluminum with a sulfuric acid solution and coating the aluminum with a chrome-based solution using rollers. The facility currently employs about 80



SCALE 1:24000



SCALE: 1" = 2,000'



QUADRANGLE LOCATION

ALCAN ROLLED PRODUCTS COMPANY
WARREN, OHIO

FIGURE 1
FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

ALCAN.DWG - 10/30/82 - MJB 308-R050320422

SOURCE: MODIFIED FROM USGS, 1984

people. The facility typically operates three 8-hour shifts per day, five days per week. Solid wastes generated by facility operations and the SWMUs where they are managed are discussed in detail in Section 2.3.

Facility operations take place within the 500,000-square-foot Main Building. The facility treats coating line wastewaters in its Wastewater Treatment System (SWMU 5), also located within this building. Containerized wastes are currently managed in Satellite Accumulation Areas (SWMU 6) and a Sludge Roll-Off Box (SWMU 4), which are located inside the Main Building, and in Storage Building 21 (SWMU 1), located south of the Main Building.

The Alcan facility is a division of Alcan Aluminum Corporation, a wholly-owned subsidiary of Alcan Aluminum Limited of Montreal, Quebec, Canada. Alcan began operations at the facility as Alcan Sheet and Plate in about 1965. Past facility operations also included cold rolling and annealing of aluminum; these operations were discontinued in about 1986. Prior to 1965, the Bridgeport Brass Company and National Distillers conducted similar operations at the facility. According to facility representatives, the facility was originally built about 1914 and operated by the U.S. Navy. Further details regarding past facility operations were not available.

2.3 WASTE GENERATION AND MANAGEMENT

As part of its operations, Alcan generates several hazardous and nonhazardous waste streams. Wastes generated by the facility are discussed below and summarized in Table 2. Waste characterizations and generation rates were provided by facility representatives during the VSI.

Waste paint (F003, F005, D001, and D035) is generated by coating operations as off-specification and outdated material. Currently, this waste is stored for less than 90 days in Storage Building 21 (SWMU 1). In the past, this waste was managed at the Hazardous Waste Storage Pad (SWMU 2) and the Container Storage Area (SWMU 3). The waste is ultimately shipped off site to OHM Resource Recovery (OHM) of Morrow, Georgia, for fuels blending. Alcan generates approximately four drums of this waste every 90 days.

Waste solvent (F003, F005, D001, and D035), or "scrap KK solvent," is generated when the coating lines are cleaned and flushed. Alcan uses methyl ethyl ketone (MEK) and methyl isobutyl ketone (MIBK) during these operations. Currently, waste solvent is accumulated in 55-gallon drums at the Satellite Accumulation Areas (SWMU 6). When the drums are full, they are transferred to Storage Building 21 (SWMU 1) for less than 90-day storage. In the past, this waste was managed at the Hazardous Waste Storage Pad (SWMU 2) and the Container Storage Area

(SWMU 3). This waste is ultimately shipped off site to OHM for fuels blending. Alcan generates approximately 40 to 50 drums of this waste every 90 days.

Waste solvent-soaked rags (F003, F005, D001, and D035) are generated when equipment associated with the coating lines and paint mix rooms are cleaned. Currently, this waste is stored for less than 90 days at Storage Building 21 (SWMU 1). In the past, this waste was managed at the Hazardous Waste Storage Pad (SWMU 2) and the Container Storage Area (SWMU 3). The waste is ultimately shipped off site to OHM for fuels blending. Alcan generates approximately one drum of this waste every 90 days.

Waste chromic acid sludge (D002 and D007) is generated when the coating line tanks are cleaned out. This waste is stored for less than 90 days at Storage Building 21 (SWMU 1). The waste is ultimately shipped off site to OHM for deactivation and disposal. Alcan generates approximately two drums of this waste every 90 days.

Wastewater treatment sludge (F019) is collected in an approximately 1-cubic-yard box at the Wastewater Treatment System (SWMU 5). When full, this waste is transferred to the Sludge Roll-Off Box (SWMU 4) for less than 90-day storage. This waste is ultimately shipped off site to Envirite Corporation of Canton, Ohio, for treatment and disposal. Alcan generates approximately 20 cubic yards of this waste every 1.5 weeks. According to facility representatives, this waste does not exhibit hazardous characteristics.

Waste carbon tetrachloride (F001) is generated by quality control (QC) testing activities. This waste is accumulated in a 55-gallon drum at the Satellite Accumulation Areas (SWMU 6). When the drum is full, it is transferred to Storage Building 21 (SWMU 1) for less than 90-day storage. This waste is ultimately shipped off site to OHM for fuels blending. Alcan generates approximately one drum of this waste per year.

During 1991 and 1992, the facility also generated two nonroutine hazardous wastes. Waste trichloroethane (TCA) (F001) was generated during parts cleaning and a waste bleach and water solution (D002 and D007) was generated when the microfiltration unit on the Wastewater Treatment System (SWMU 5) was cleaned. These wastes were stored on site in Storage Building 21 (SWMU 1) before off-site shipment to OHM for treatment or fuels blending.

Nonhazardous wastewaters, including rinse waters and chrome phosphate solution from coating line pretreatment, are treated by the Wastewater Treatment System (SWMU 5). Sludge from this system is managed as discussed above. Effluent wastewater is discharged to the publicly owned treatment works (POTW).

Nonhazardous waste wax coatings and aluminum sheet cleaning residue are generated during tank cleanout and maintenance activities associated with the coating line. These wastes are drummed and stored at Storage Building 21 (SWMU 1) before off-site shipment to OHM. About two to four and four to six drums of these wastes are generated every 90 days, respectively.

Nonhazardous used oils consist primarily of hydraulic oils that are generated during maintenance activities. Currently, this waste is stored for less than 90 days at Storage Building 21 (SWMU 1). Until 1986, this waste also included cooling oils generated by the former cold mill operations and was managed at the Hazardous Waste Storage Pad (SWMU 2), the Container Storage Area (SWMU 3), or the Used Oil Storage Tank (SWMU 7). The waste is ultimately shipped off-site to Research Oil of Cleveland, Ohio, for fuels blending.

In the past, the facility generated one nonroutine nonhazardous waste. Nonhazardous oven ash was generated when ventilation ducts at the facility were cleaned. This waste was drummed and stored at Storage Building 21 (SWMU 1) prior to off-site shipment to OHM. Alcan facility representatives did not anticipate further generation of this waste.

The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs and AOCs, is shown in Figure 2. The facility's waste streams are summarized in Table 2.

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the facility.

According to facility representatives, Alcan released 300 gallons of roll coolant, a kerosene-based oil used during former cold rolling operations, to the city sewer on May 17, 1984. This release was reported to the city. No further action was taken, and no citations were issued regarding this release. Cold rolling operations at the facility were discontinued in about 1986. PRC found no other documentation of releases to environmental media at the Alcan facility.

2.5 REGULATORY HISTORY

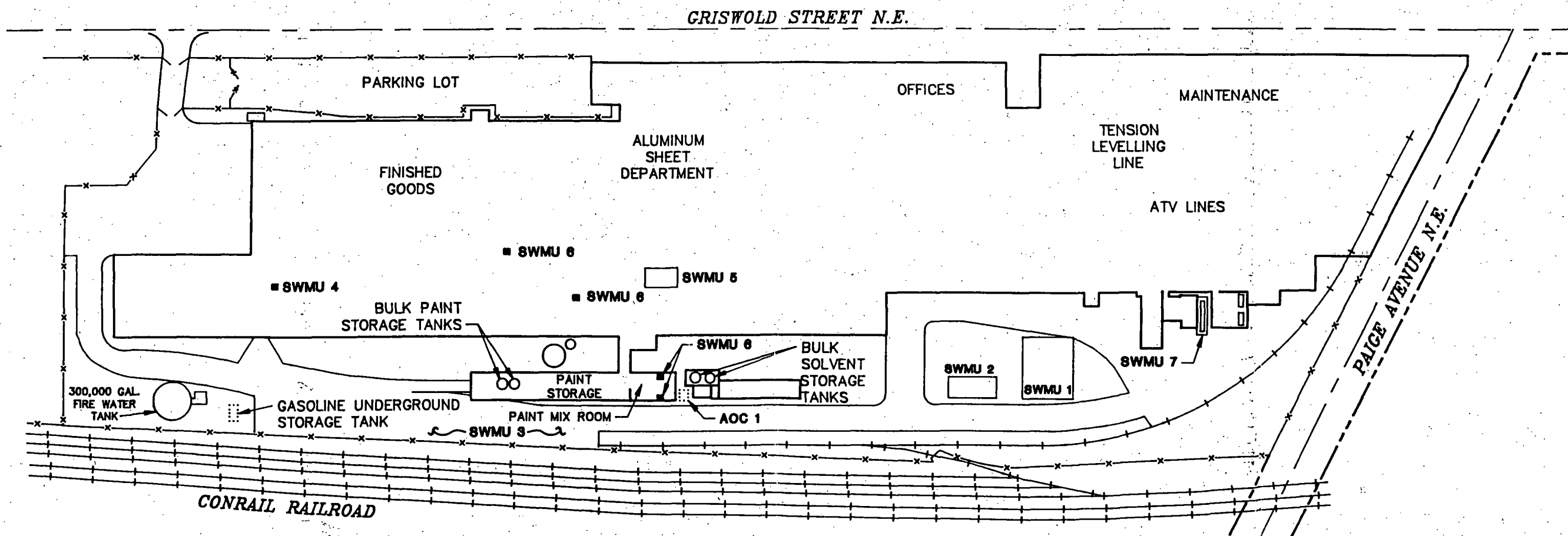
In August 1980, the Alcan facility submitted a Notification of Hazardous Waste Activity as a generator and treatment, storage, or disposal (TSD) facility (Alcan, 1980a). In November 1980, the facility submitted a Part A Permit Application. This application listed container

TABLE 1
SOLID WASTE MANAGEMENT UNITS

<u>SWMU Number</u>	<u>SWMU Name</u>	<u>RCRA Hazardous Waste Management Unit^a</u>	<u>Status</u>
1	Storage Building 21	No	Active; less than 90-day storage of hazardous waste
2	Hazardous Waste Storage Pad	No	Inactive; less than 90-day storage of hazardous waste
3	Container Storage Area	Yes	Inactive; EPA and OEPA RCRA-closure approval in 1984 and 1985, respectively
4	Sludge Roll-Off Box	No	Active; less than 90-day storage of hazardous waste
5	Wastewater Treatment System	No	Active
6	Satellite Accumulation Areas	No	Active; accumulation of hazardous waste
7	Used Oil Storage Tank	No	Inactive

Note:

^a A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



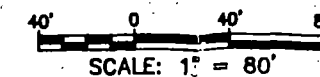
LEGEND

SOLID WASTE MANAGEMENT UNITS

- SWMU 1 STORAGE BUILDING 21
- SWMU 2 HAZARDOUS WASTE STORAGE PAD
- SWMU 3 CONTAINER STORAGE AREA
- SWMU 4 SLUDGE ROLL-OFF BOX
- SWMU 5 WASTEWATER TREATMENT SYSTEM
- SWMU 6 SATELLITE ACCUMULATION AREAS
- SWMU 7 USED OIL STORAGE TANK

AREA OF CONCERN

- AOC 1 SOLVENT UNDERGROUND STORAGE TANK



ALCAN ROLLED PRODUCTS COMPANY
WARREN, OHIO

FIGURE 2
FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

TABLE 2
SOLID WASTES

<u>Waste/EPA Waste Code^a</u>	<u>Source</u>	<u>Solid Waste Management Unit</u>
Waste paint/F003, F005, D001, and D035	Off-specification and outdated material	1, 2, and 3
Waste solvent/F003, F005, D001, and D035	Equipment cleaning and line flushing	1, 2, 3, and 6
Waste solvent-soaked rags/F003, F005, D001, and D035	Equipment cleaning	1, 2, and 3
Chromic acid sludge/D002 and D007	Tank cleaning	1
Wastewater treatment sludge/F019	Wastewater treatment	4 and 5
Waste carbon tetrachloride/F001	Quality control testing	1 and 6
Waste trichloroethane/F001	Outdated material	1
Bleach and water solution/D002 and D007	Cleaning of microfiltration system	1
Wastewaters/NA	Aluminum coating	5
Waste wax coatings/NA	Aluminum coating	1
Aluminum sheet cleaning residue/NA	Aluminum coating	1
Used oils/NA	Maintenance	1, 2, 3, and 7
Oven ash/NA	Cleaning of ventilation ducts	1

Note:

^a Not applicable (NA) designates nonhazardous waste.

storage (S01) of F017 waste (Alcan, 1980b); the S01 unit referred to the Container Storage Area (SWMU 3). In August 1982, Alcan revised its Part A permit application; this revised application replaced the F017 waste code with F003, F005, and D001 waste codes (Alcan, 1982b).

In July 1982, Alcan requested that OEPA grant the facility a waiver to the 50-foot setback requirements for ignitable wastes (D001) stored at its Container Storage Area (SWMU 3) (Alcan, 1982a). This request was resubmitted in September 1982 (Alcan, 1982c). OEPA ultimately denied Alcan's request (Alcan, 1983a). In September 1983, Alcan notified OEPA of its new Hazardous Waste Storage Pad (SWMU 2), which met the 50-foot setback requirements (Alcan, 1983d).

In June 1983, Alcan submitted a closure plan to OEPA and requested the removal of its status as a storage facility (Alcan, 1983b). This request and closure plan were resubmitted in August 1983 (Alcan, 1983c). No sampling activities were specified in the facility closure plan. Pursuant to this request, OEPA conducted an inspection of the Alcan facility to confirm Alcan's ability to comply with the generator regulations. Inspection findings prompted a recommendation that the facility's permit be withdrawn and noted that Alcan had begun using a "new temporary storage area," referring to the Hazardous Waste Storage Pad (SWMU 2) (OEPA, 1983). In September 1984, EPA acknowledged Alcan's change in status to a generator only (EPA, 1984). OEPA acknowledged Alcan's status change in April 1985 (OEPA, 1985).

In the past, the Alcan facility has been inspected for RCRA compliance (OEPA 1981; 1982; 1984; and 1991a). Violations noted during these inspections included improper recordkeeping, not complying with the 50-foot setback rule for storing ignitable wastes, improper manifesting of hazardous wastes, storing open satellite accumulation containers, and improper container labelling. Alcan achieved compliance for RCRA violations noted during the most recent compliance inspection (OEPA, 1991b).

The Alcan facility has no National Pollutant Discharge Elimination (NPDES)-permitted discharges. Industrial wastewaters are discharged to the Warren Municipal Water Control Department's POTW via a combined sanitary and storm sewer. According to facility representatives, the facility participates in an OEPA-approved industrial discharge program with the POTW. PRC found no documentation of noncompliance with discharge requirements.

Alcan also operates under several air permits, including permits for the coating lines and drying ovens that expire on July 15, 1995 (OEPA, 1992a; 1992b). PRC found no documentation of noncompliance with air permit requirements.

Two underground storage tanks (UST) are located at the Alcan facility. An 8,000-gallon, steel UST for gasoline is located southwest of the Main Building. This tank was moved to its current location in 1984. The gasoline UST passed tightness testing in December 1991 (Tank Integrity Services, Inc., 1991). According to Alcan facility representatives, the 8,000-gallon UST is scheduled for removal in 1993. Facility representatives also stated that a 5,000-gallon, steel UST for solvent (MEK) storage is located south of the Main Building. This Solvent UST (AOC 1) was installed in 1977, and facility representatives stated that it is scheduled for removal in late 1992. PRC found no documentation of tightness testing or soil sampling for this UST, and it is not equipped with secondary containment.

PRC found no documentation of Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) activity at the Alcan facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

2.6.1 Climate

The average temperatures in Trumbull County range from a low of 31°F in January to a high of 81°F in July. Average annual precipitation is 37.33 inches per year (NOAA, 1990). The mean annual lake evaporation is between 28 and 30 inches (USDC, 1968). Precipitation is well distributed during the year. From late fall through winter, snow squalls are frequent and total normal snowfall is heavy. Of the total annual precipitation, 60 percent usually falls between April and September. Average relative humidity in midafternoon is about 60 percent. Humidity is greater at night, and the average humidity at dawn is about 80 percent. The maximum 24-hour rainfall is about 2 inches. The prevailing wind direction is to the southwest. Average wind speed is highest in January at 11.7 miles per hour (NOAA, 1990).

2.6.2 Flood Plain and Surface Water

The Alcan facility is not located in a 100-year floodplain (USGS, 1974). Drainage at the facility is directed to storm sewers that combine with the sanitary sewers and flows to the POTW. The POTW discharges treated effluent to the Mahoning River. The Mahoning River is located about 0.75 mile west of Alcan and is the nearest surface water body to the facility. The Mahoning River is used for industrial and recreational purposes and flows southwest to Mosquito Creek. At its nearest point, Mosquito Creek is located about 2.5 miles from the facility. This

creek originates at Mosquito Creek Lake. Surface water from Mosquito Creek Lake is used as the primary source of drinking water for the city of Warren (PRC, 1992a). This lake is located about 4 miles northeast of Alcan (USGS, 1984).

2.6.3 Geology and Soils

Site-specific geology information was not available; therefore, regional geology is presented. Trumbull County, Ohio, is located within the glaciated portion of the Allegheny Plateau. The county is chiefly underlain by nearly horizontal beds of sandstone and shale of Mississippian and Pennsylvanian ages. Glacial drift covers the entire county except for a few bedrock outcrops in valleys and sandstone ledges on some hillsides. Tills in the area are characteristic Hiram till, which is typically 3 to 10 feet of ground moraine comprised mainly of clay and silty clay till (White, 1971).

Soils associated with this area are called urban land. Urban land soils are almost level (0 to 6 percent slopes). Urban land soils are not easily discernible because of man-made obstacles such as streets, parking lots, and buildings, that obscure or alter the soils, making identification impossible at times. Only limited acreage is natural soil. As a result, runoff from these areas increases in volume and rate (USSCS, 1981).

2.6.4 Ground Water

Site-specific ground-water information was not available; therefore, regional information is presented. Ground water is generally available throughout Trumbull County, although in widely differing amounts at various depths. Ground water in the county can be obtained in moderate to large quantities from two contrasting types of aquifers: (1) the Pleistocene glaciofluvial sand and gravel deposits, and (2) the sandstone. Glacial deposits, particularly sand and gravel, are important aquifers where they have sufficient extent and thickness. Areas with the greatest potential yield of ground water are the preglacial and interglacial channels, which are wholly or partially filled with glaciofluvial deposits of varying thickness. Depths to these aquifers range from 20 to 75 feet. Underlying Mississippian and Pennsylvanian sandstones and sandy shales occasionally yield 15 to 25 gallons per minute, although yields of as high as 50 gallons per minute have been reported. The depth to bedrock aquifers ranges from 100 to 200 feet in the area (Crowell, 1979). Ground-water flow direction could not be documented; however, flow is likely west toward the Mahoning River.

Ground water is not used as the primary source of drinking water for the area. However, some private wells are located in the area. The nearest drinking water well is located between 0.75 and 1 mile from the facility. This well is located upgradient of the facility (PRC, 1992a).

2.7 RECEPTORS

The Alcan facility occupies about 26.5 acres in a mixed-use industrial and residential area in Warren, Trumbull County, Ohio. According to 1990 census data, the population of Warren is about 50,793 (Warren Area Chamber of Commerce, undated).

Alcan is bordered on the north by a commercial and residential area across Griswold Street NE; on the east by the Packard Electric facility across Paige Avenue; on the south by the General Electric and Packard Electric facilities across the Conrail railroad tracks; and on the west by property leased from Alcan to Erieview Cartage, which is a trucking company, and a commercial area across North Park Avenue. The nearest residence is located within 0.5 mile north of the facility. The nearest schools are located between 0.5 and 1 mile east and west of the facility (USGS, 1984).

Facility access is limited by a 6-foot, chain-link fence with three strands of barbed wire. This fence surrounds the facility, except along the northeast portion of the facility where the facility building abuts the property edge along Griswold Street NE and Paige Avenue.

The Mahoning River is located about 0.75 mile west of Alcan and is the surface water body nearest to the facility. The Mahoning River is used for industrial and recreational purposes and flows southwest to Mosquito Creek, which is about 2.5 miles from the facility at its nearest point. Mosquito Creek originates at Mosquito Creek Lake. Surface water from Mosquito Creek Lake is used as the primary source of drinking water for the city of Warren (PRC, 1992a). This lake is located about 4 miles northeast of Alcan (USGS, 1984).

Ground water is not used as the primary source of drinking water for the area. However, some private wells are located in the area. The nearest drinking water well is located between 0.75 and 1 mile from the facility. This well is located upgradient of the facility (PRC, 1992a).

Sensitive environments are not located on site. However, wetland areas greater than two acres in size are located within 1 mile of the facility (USDOI, undated).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the seven SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1

Storage Building 21

Unit Description:

This unit consists of a corrugated steel building with a concrete floor. The building measures approximately 60 by 72 feet. Hazardous wastes are stored in containers within an approximately 30-foot by 35-foot bermed area of the building. Cracks in the concrete floor of this designated area and the area along the concrete berm have been sealed. Nonhazardous wastes are not stored within the bermed area, but are stored on a concrete floor. The area surrounding the unit is paved with asphalt.

Date of Startup:

This unit began operations in 1987.

Date of Closure:

This unit is currently active.

Wastes Managed:

This unit stores containers of waste paint, waste solvent, and waste solvent-soaked rags (F003, F005, D001, and D035); chromic acid sludge and bleach and water solution (D002 and D007); waste carbon tetrachloride and TCA (F001); and nonhazardous waste wax coatings, aluminum sheet cleaning residue, used oil, and oven ash. These wastes are ultimately shipped off site for treatment or disposal. Hazardous wastes are stored at this unit for less than 90 days.

Release Controls:

Wastes are managed in closed containers located indoors on a concrete floor. Containers of hazardous waste are stored within a bermed area of the building.

History of Documented Releases:

No releases from this unit have been documented.

Observations:

At the time of the VSI, PRC noted six drums of waste solvent (F003, F005, D001, and D035), four drums of chromic acid sludge (D002 and D007), one drum of waste TCA (F001), and several smaller containers of waste paint (F003, F005, D001, and D035) within the bermed area. About 40 drums of used oil were stored outside the bermed area. No evidence of release was noted (see Photographs No. 1, 2, 3, and 5).

SWMU 2

Hazardous Waste Storage Pad

Unit Description:

This unit consisted of an outdoor concrete pad located south of the facility's Main Building. The unit measured approximately 20 feet by 40 feet and managed containers of nonhazardous waste and hazardous waste for less than 90 days. The unit had no forms of release controls and was surrounded by asphalt and gravel areas.

Date of Startup:

This unit began operation in 1983.

Date of Closure:

This unit became inactive in 1987.

Wastes Managed:

This unit stored containers of waste paint, waste solvent, and waste solvent-soaked rags (F003, F005, D001, and D035) and nonhazardous used oil. These wastes were ultimately shipped off site for treatment or disposal. Hazardous wastes were stored at this unit for less than 90 days.

Release Controls:

This unit was located in a concrete area, but had no other forms of release controls.

**History of
Documented Releases:**

No releases from this unit have been documented.

Observations:

This unit was inactive at the time of the VSI. It was being used to store miscellaneous parts and equipment. PRC did not note any evidence of release (see Photograph No. 4).

SWMU 3**Container Storage Area****Unit Description:**

This unit consisted of an outdoor, asphalt area that measured approximately 150 feet by 40 feet. Drums of raw materials and wastes were stored in this area. The total capacity of the area was approximately 400 drums (Alcan, 1982a). The area is located along the fence at the facility's southern boundary, adjacent to off-site railroad tracks.

Date of Startup:

This unit began operations in about 1965.

Date of Closure:

This unit has been inactive since 1983. EPA and OEPA approved RCRA closure in 1984 and 1985, respectively. The unit is currently used to store empty drums.

Wastes Managed:

This unit stored containers of waste paint, waste solvent, and waste solvent-soaked rags (F003, F005, D001, and D035) and nonhazardous used oil. These wastes were ultimately shipped off site for treatment or disposal. Hazardous wastes were stored at this unit for greater than 90 days.

Release Controls:

This unit was located on an asphalt paved area, but had no other form of release controls.

**History of
Documented Releases:**

No releases from this unit have been documented.

Observations:

PRC noted that empty drums awaiting off-site shipment for reconditioning or return of deposit were being stored in this area. A storm sewer is located in the vicinity of this unit. PRC noted several cracks in the asphalt and some evidence of paint stains. No waste was being stored at this unit at the time of the VSI (see Photograph No. 7).

SWMU 4**Sludge Roll-Off Box****Unit Description:**

This unit consists of a steel, 20-cubic-yard roll-off box. This unit is lined with plastic and located indoors on a concrete floor. The

unit is stored open while on site, but it is equipped with a tarp to cover the unit during off-site transport.

Date of Startup: This unit began operation in 1989.

Date of Closure: This unit is currently active.

Wastes Managed: This unit is used to store dewatered wastewater treatment sludge (F019) generated by the facility's Wastewater Treatment System (SWMU 5). This sludge is stored for less than 90 days. This waste is ultimately shipped off site.

Release Controls: This unit is lined with plastic and located indoors on a concrete floor.

History of Documented Releases: No releases from this unit have been documented.

Observations: PRC observed that this unit was open at the time of the VSI but was equipped with a tarp to cover the unit during off-site transport. The unit appeared to be in sound condition, and no evidence of release was noted (see Photograph No. 8).

SWMU 5 Wastewater Treatment System

Unit Description: This unit is a Memtek Corporation system used to treat wastewaters generated by facility coating operations. The unit is located inside the Main Building and consists of the following: two fiberglass-lined, concrete collection sumps; a 2,500-gallon equalization tank; a 300-gallon hexavalent chromium reduction tank; a 300-gallon precipitation reaction tank; a 600-gallon concentration tank; a 200-gallon water flush tank; a 200-gallon cleaning solution tank; a 1,000-gallon post-neutralization tank; a 2,000-gallon sludge collection tank; a microfiltration unit; a filter press; and a 1-cubic-yard sludge collection box. The tanks are constructed of steel or fiberglass and are located aboveground.

Date of Startup: This unit began operation in 1989.

Date of Closure:	This unit is currently active.
Wastes Managed:	This unit manages nonhazardous wastewaters generated by facility coating operations and dewatered wastewater treatment sludge (F019).
Release Controls:	This unit is located indoors on a concrete floor. The elements of this unit are contained within berms or trenches. Releases from this unit would be directed to an approximately 15,000-gallon concrete containment sump. This sump is not part of the Wastewater Treatment System. It is used only for secondary containment of releases from the Wastewater Treatment System and from the raw material and product storage areas.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	PRC observed that this unit appeared to be in sound condition and adequately contained. No evidence of release was noted (see Photographs No. 9 and 10).
SWMU 6	Satellite Accumulation Areas
Unit Description:	This unit consists of 55-gallon drums used to accumulate hazardous waste at or near the point of generation. When waste is not being added or removed, these drums are stored closed. Each Satellite Accumulation Area is located indoors on a concrete floor.
Date of Startup:	This unit began operation at various times during the 1980s.
Date of Closure:	This unit is currently active.
Wastes Managed:	This unit is used to accumulate up to 55 gallons of waste carbon tetrachloride (F001) and waste solvents (F003, F005, D001, and D035). When full, these drums are transferred to Storage Building 21 (SWMU 1) for less than 90-day storage prior to off-site transport.

Release Controls:	This unit is located indoors on a concrete floor./
History of Documented Releases:	No releases from this unit have been documented.
Observations:	At the time of the VSI, PRC observed that Alcan was operating three waste solvent Satellite Accumulation Areas and one waste carbon tetrachloride Satellite Accumulation Area. One waste solvent Satellite Accumulation Area was moved temporarily due to construction activities at the facility. No evidence of release was noted (see Photographs No. 11, 12, 13, and 14).
SWMU 7	Used Oil Storage Tank
Unit Description:	This unit consisted of a steel, railroad tank car converted to a stationary storage tank for nonhazardous used oil. The tank car is located outdoors within a concrete diked area and has a capacity of 10,000 gallons.
Date of Startup:	This unit began operation in the 1970s.
Date of Closure:	This unit became inactive in 1986.
Wastes Managed:	This unit was used to manage nonhazardous used oils from the former cold mill operations.
Release Controls:	This unit was located within a 3-foot-high diked area that measured approximately 25 feet by 18 feet.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	Facility representatives did not identify this unit during the VSI and information regarding this unit was not available during the PA; therefore, PRC did not observe this unit. Facility representatives provided PRC with the information regarding this unit after the VSI (PRC, 1992b).

4.0 AREAS OF CONCERN

PRC identified one AOC during the PA/VSI. This AOC is discussed below; its location is shown in Figure 2.

AOC 1 Solvent UST

This UST is constructed of steel and was installed south of the Main Building in 1977. This UST stored product solvent, primarily MEK, and has a capacity of 5,000 gallons. An inactive, 5,000-gallon, steel aboveground storage tank is also located in this area. These tanks became inactive in July 1992. No documentation of tightness testing or soil sampling at the UST exists, and it has no secondary containment. Past releases from the UST may have occurred and not been detected; therefore, PRC considers the UST to be an AOC. At the time of the VSI, this UST was scheduled for removal in late 1992. The Solvent UST area is shown in Photograph No. 6.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified seven SWMUs and one AOC at the Alcan facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. AOCs are discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU and AOC. Table 3, at the end of this section, summarizes the SWMUs and AOC at the facility and the recommended further actions.

SWMU 1

Storage Building 21

Conclusions:

This unit is currently active for the storage of hazardous and nonhazardous wastes in closed 55-gallon drums. Hazardous wastes are stored for less than 90 days within a bermed, concrete area. The unit is surrounded by an asphalt area. No releases from this unit have been documented. The potential for release to all environment media is low.

Recommendations:

PRC recommends no further action at this time.

SWMU 2

Hazardous Waste Storage Pad

Conclusions:

This unit has been inactive since 1987. The unit has no history of documented releases, and no evidence of release was noted during the VSI. The potential for release to all environmental media is low.

Recommendations:

PRC recommends no further action at this time.

SWMU 3

Container Storage Area

Conclusions:

RCRA closure of this unit was approved by EPA and OEPA in 1984 and 1985, respectively. This unit has been inactive since 1983. This unit has no documented release history. The potential for release to all environmental media is low.

Recommendations:

PRC recommends no further action at this time.

SWMU 4**Sludge Roll-Off Box**

Conclusions: This unit is currently active for less than 90-day storage of a non-liquid hazardous waste. This unit is lined with plastic and located indoors on a concrete floor. No releases from this unit have been documented. The potential for release to all environmental media is low.

Recommendations: PRC recommends no further action at this time.

SWMU 5**Wastewater Treatment System**

Conclusions: This unit is located indoors on a concrete floor. The elements of this unit are contained within berms or trenches. No releases from this unit have been documented. The potential for release to all environmental media is low.

Recommendations: PRC recommends no further action at this time.

SWMU 6**Satellite Accumulation Areas**

Conclusions: These areas are located indoors on a concrete floor. Drums in these areas are stored closed when waste is not being added or removed. No releases from this unit have been documented. The potential for release to all environmental media is low.

Recommendations: PRC recommends no further action at this time.

SWMU 7**Used Oil Storage Tank**

Conclusions: This unit was identified from information provided to PRC after the VSI; therefore, PRC did not observe this unit. According to facility representatives, this unit has been inactive since 1986. When operating, this unit managed nonhazardous used oil from past cold rolling operations and was located within a diked secondary containment area. No releases from this unit have been documented. The potential for release to all environmental media is low.

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RIN # 639-99
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ENFORCEMENT
CONFIDENTIAL

Recommendations: Based on information provided by facility representatives, PRC recommends no further action at this time.

AOC 1 Solvent UST

Conclusions: This UST is constructed of steel and was installed in 1977. This UST stored product solvent, primarily MEK, until July 1992. No documentation of tightness testing or soil sampling at this UST exists, and it has no secondary containment. Past releases may have occurred and not been detected. At the time of the VSI, this UST was scheduled for removal in late 1992.

Recommendations: PRC recommends that removal of the facility's Solvent UST (AOC 1), scheduled for late 1992, continues as scheduled under the supervision of the local fire marshall. Soil sampling may also be required to determine the extent of any contamination that exists at this AOC.

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TABLE INITIALS

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SWMU AND AOC SUMMARY

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Storage Building 21	1987 to present	None	None
2. Hazardous Waste Storage Pad	1983 to 1987	None	None
3. Container Storage Area	1965 to 1983	None	None
4. Sludge Roll-Off Box	1989 to present	None	None
5. Wastewater Treatment System	1989 to present	None	None
6. Satellite Accumulation Areas	1980s to present	None	None
7. Used Oil Storage Tank	1970s to 1986	None	None

<u>AOC</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Solvent UST	1977 to 1992	None	Remove tank under local fire marshall supervision; soil sampling may be required to determine the extent of past releases

REFERENCES

- Alcan Rolled Products Company [formerly Alcan Sheet and Plate](Alcan), 1980a. Notification of Hazardous Waste Activity, August 15.
- Alcan, 1980b. Part A Permit Application, November 17.
- Alcan, 1982a. Letter to Bob Fagale, Ohio Environmental Protection Agency (OEPA), requesting a waiver from the 50-foot setback rule for ignitable wastes, July 22.
- Alcan, 1982b. Submittal letter to Christine Mikoy Frazier, OEPA, and attached Revised Part A Permit Application, August 11.
- Alcan, 1982c. Letter to Wayne Nichols, OEPA, requesting a waiver from the 50-foot setback rule for ignitable wastes, September 7.
- Alcan, 1983a. Letter to Christine Mikoy Frazier, OEPA, requesting written confirmation of denial of a waiver from the 50-foot setback rule for ignitable wastes, February 22.
- Alcan, 1983b. Letter to Thomas Crepeau, OEPA, requesting removal of the facility's storage status, June 28.
- Alcan, 1983c. Letter to Thomas Crepeau, OEPA, requesting removal of the facility's storage status, August 29.
- Alcan, 1983d. Letter to Christine M. Frazier, OEPA, notifying of the relocation of the hazardous waste facility to at least 50 feet from the property line, September 30.
- Crowell, Katie Shafer, 1979. Ground-Water Resources of Trumbull County, Ohio, Ohio Department of Natural Resources.
- National Oceanic and Atmospheric Administration (NOAA), 1990. Normals, Means, and Extremes.
- OEPA, 1981. Letter to A. G. Hindale, Alcan, regarding July 9, 1981, inspection, September 2.
- OEPA, 1982. Letter to Donzel Green, Alcan, regarding February 10, 1982, inspection, May 28.
- OEPA, 1983. Letter to Donzel Green, Alcan, regarding July 18, 1983, inspection, September 26.
- OEPA, 1984. Letter to Donzel Green, Alcan, regarding April 18, 1984, inspection, May 11.
- OEPA, 1985. Letter to D.D. Foley, Alcan, acknowledging change in status to a generator only, April 1.
- OEPA, 1991a. Letter to Mr. Reynolds, Alcan, regarding July 24, 1991, inspection, August 9.
- OEPA, 1991b. Letter to Mr. Reynolds, Alcan, regarding return to compliance for violations noted during July 24, 1991, inspection, September 4.
- OEPA, 1992a. Permit to Operate an Air Contaminant Source No. 0278080136K001, issued July 16.
- OEPA, 1992b. Permit to Operate an Air Contaminant Source No. 0278080136K002, issued July 16.

PRC Environmental Management, Inc. (PRC), 1992a. Record of interview with Jim Gregory, Warren Water Department, October 27.

PRC, 1992b. Record of telephone conversation with Dale Alflen, Alcan, November 10.

PRC, 1992c. Record of telephone conversation with Dale Alflen, Alcan, November 25.

Tank Integrity Services, Inc., 1991. Letter to Dave Munson, Merit Environmental Management, regarding tightness testing of 8,000-gallon gasoline storage tank at the Alcan facility, December 23.

U.S. Department of Commerce (USDC), 1968. Climatic Atlas of the United States, U.S. Government Printing Office, Washington, D.C.

U.S. Department of the Interior (USDOI), undated. National Wetlands Inventory Maps.

U.S. Environmental Protection Agency (EPA), 1984. Letter to D.D. Foley, Alcan, acknowledging change in status to a generator only, September 27.

U.S. Geological Survey (USGS), 1974. Flood Prone Area Maps.

USGS, 1984. Topographic Maps for Warren and Champion, Ohio, Quadrangles, 7.5-Minute Series.

U.S. Soil Conservation Service (USSCS), 1981. Soil Survey of Trumbull County, Ohio.

Warren Area Chamber of Commerce, undated. Community Information.

White, George C., 1971. Glacial Geology of Trumbull County, Ohio, Ohio Division of Geological Survey, Report of Investigation No. 80.

ATTACHMENT A
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

**Alcan Rolled Products Company
390 Griswold Street NE
Warren, Ohio 44483
OHD 004 457 222**

Date: October 27, 1992

Primary Facility Representative: George Jaros
Representative Telephone No.: 216/841-3331
Additional Facility Representatives: Dale Alflen
W. Mervyn Bell
Peter Segretto

Inspection Team: Jack Brunner, PRC Environmental Management, Inc. (PRC)
Kristine Kruk, PRC

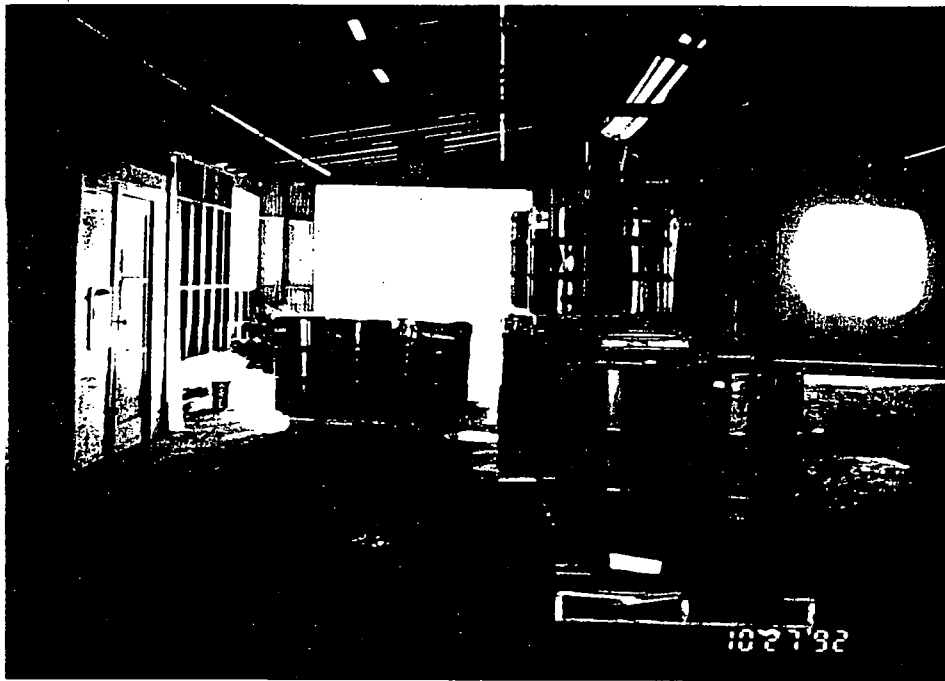
Photographer: Kristine Kruk, PRC

Weather Conditions: Morning - dense fog, about 45° F; afternoon - sunny, about 60° F

Summary of Activities: The visual site inspection (VSI) began at 8:25 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents.

The VSI tour began at 10:45 a.m. PRC first inspected areas outside the Main Building, including Storage Building 21 (SWMU 1), the Hazardous Waste Storage Pad (SWMU 2), the Container Storage Area (SWMU 3), and the Solvent UST (AOC 1). PRC then inspected areas within the Main Building, including the Sludge Roll-Off Box (SWMU 4), the Wastewater Treatment System (SWMU 5), and Satellite Accumulation Areas (SWMU 6).

The tour concluded at 12:05 p.m., after which the inspection team began the exit meeting with facility representatives. At 12:30 p.m., the inspection team took a break for lunch. The exit meeting resumed at 1:30 p.m. The VSI was completed and the inspection team left the facility at 2:15 p.m.



Photograph No. 1
 Orientation: South
 Description: Drums of nonhazardous used oil inside Storage Building 21

Location: SWMU 1
 Date: October 27, 1992



Photograph No. 2
 Orientation: South
 Description: Drums of hazardous waste inside Storage Building 21; note containment berm for hazardous waste

Location: SWMU 1
 Date: October 27, 1992



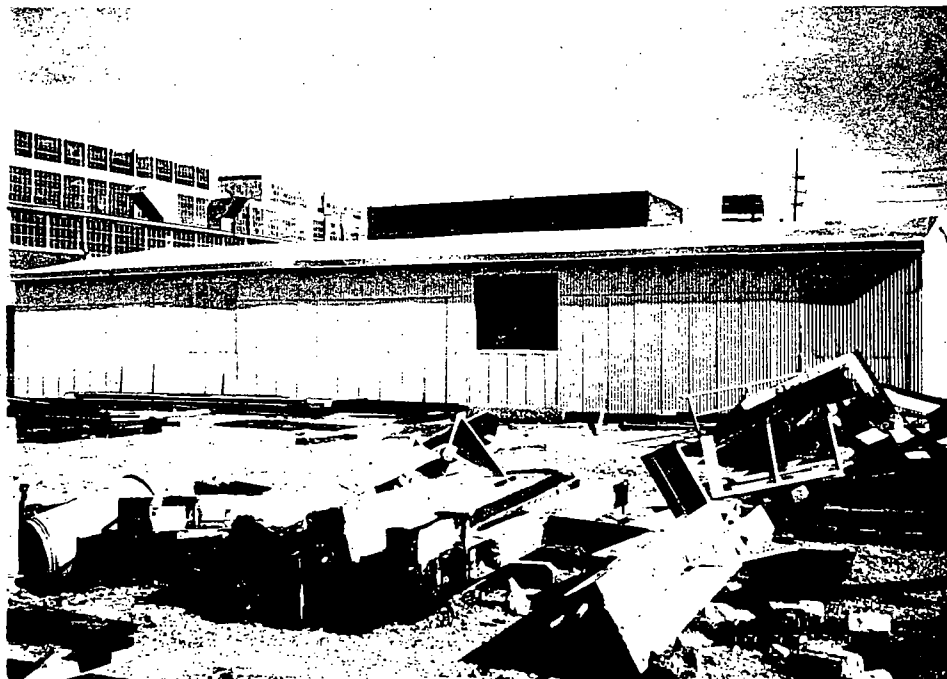
Photograph No. 3
 Orientation: Southwest
 Description: Drums of hazardous waste inside Storage Building 21

Location: SWMU 1
 Date: October 27, 1992



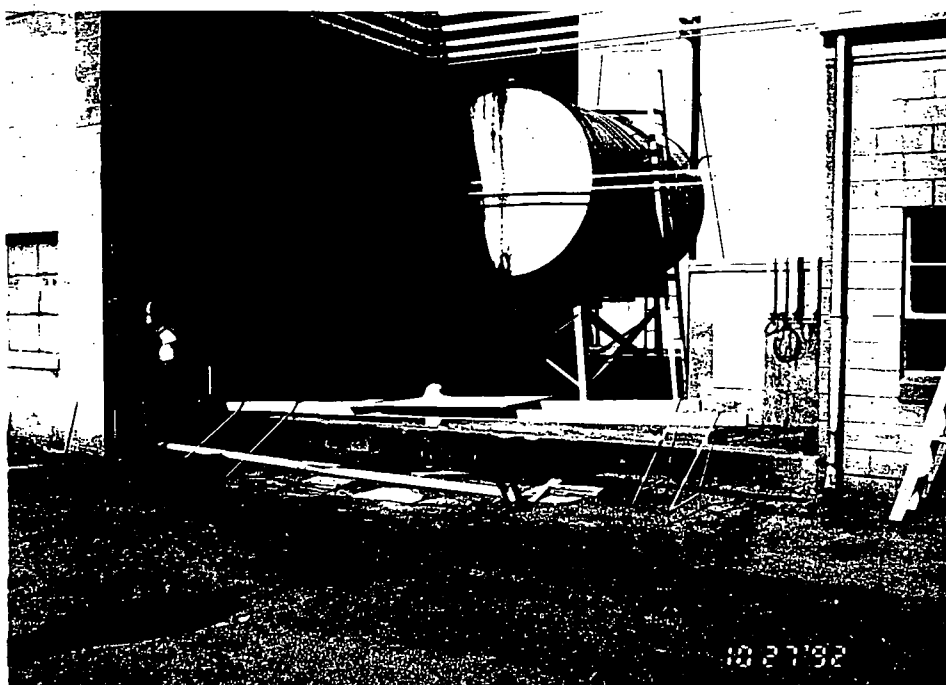
Photograph No. 4
 Orientation: Northwest
 Description: Inactive Hazardous Waste Storage Pad; note miscellaneous parts and equipment currently stored at this unit

Location: SWMU 2
 Date: October 27, 1992



Photograph No. 5
 Orientation: Northeast
 Description: Outside view of Storage Building 21

Location: SWMU 1
 Date: October 27, 1992



Photograph No. 6
 Orientation: North
 Description: Inactive aboveground solvent storage tank; Solvent UST (AOC 1) is also located in this area

Location: AOC 1
 Date: October 27, 1992



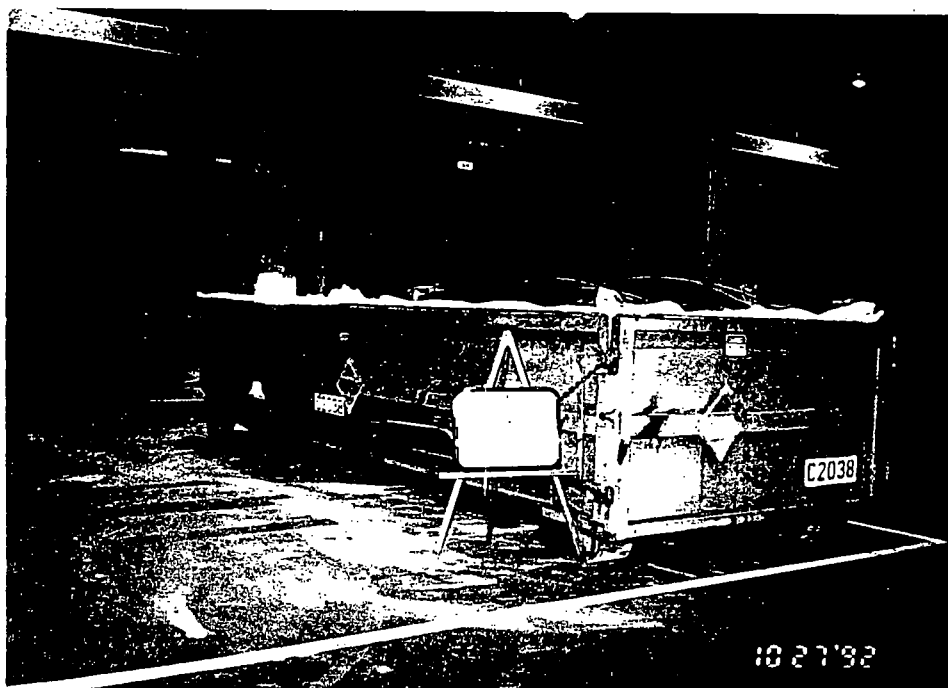
Photograph No. 7

Orientation: Southeast

Description: Container Storage Area; drums shown are empty and awaiting off-site shipment for reconditioning or return of deposit

Location: SWMU 3

Date: October 27, 1992



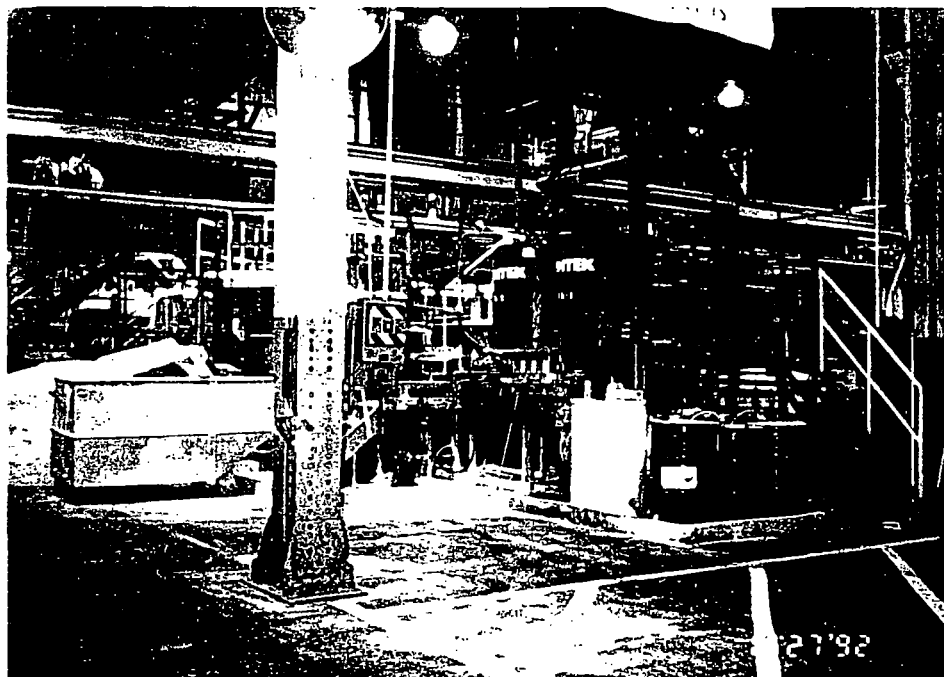
Photograph No. 8

Orientation: Southwest

Description: Sludge Roll-Off Box

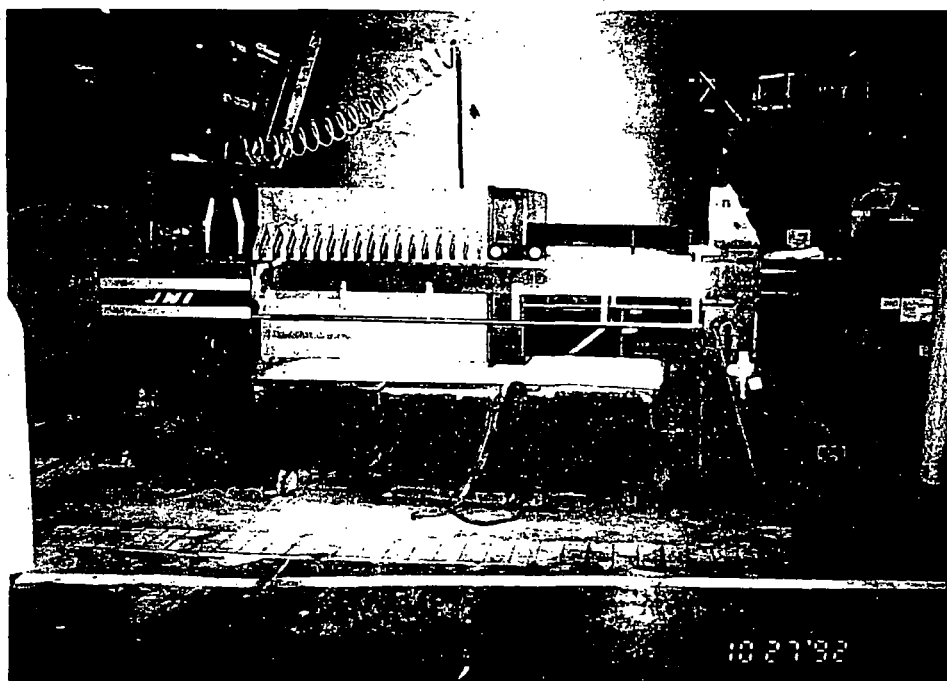
Location: SWMU 4

Date: October 27, 1992



Photograph No. 9
 Orientation: Southwest
 Description: Wastewater Treatment System; note containment berm

Location: SWMU 5
 Date: October 27, 1992



Photograph No. 10
 Orientation: East
 Description: Filter press and 1-cubic-yard box of Wastewater Treatment System (SWMU 5) used to accumulate wastewater treatment sludge (F019); note containment berm and grated trench

Location: SWMUs 5 and 6
 Date: October 27, 1992



Photograph No. 11

Orientation: Southwest

Description: Satellite Accumulation Area for waste carbon tetrachloride (F001)

Location: SWMU 6

Date: October 27, 1992



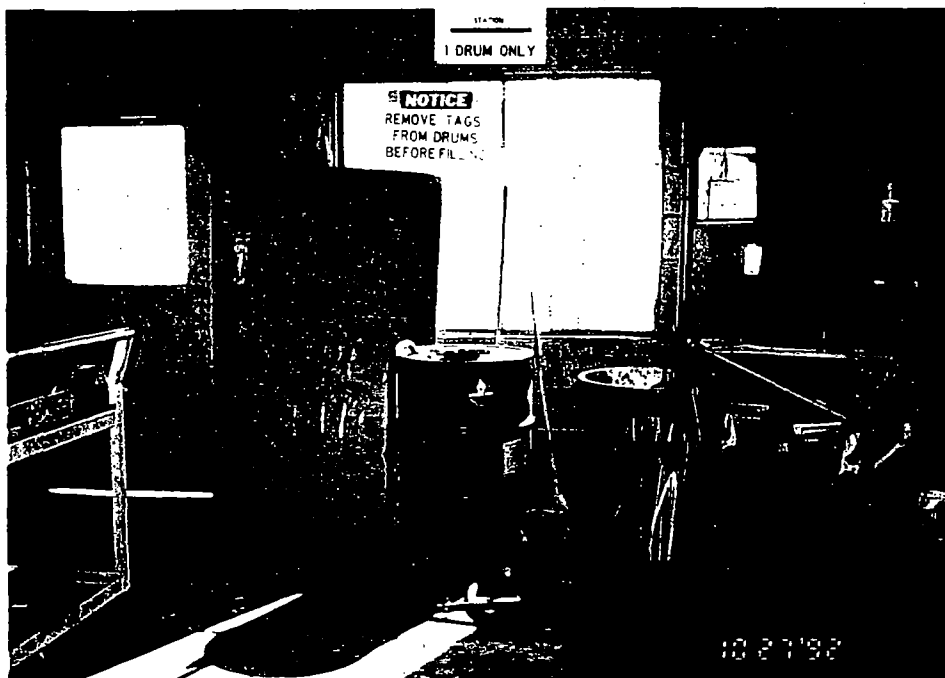
Photograph No. 12

Orientation: West

Description: Satellite Accumulation Area for waste solvent (F003, F005, D001, and D035)

Location: SWMU 6

Date: October 27, 1992



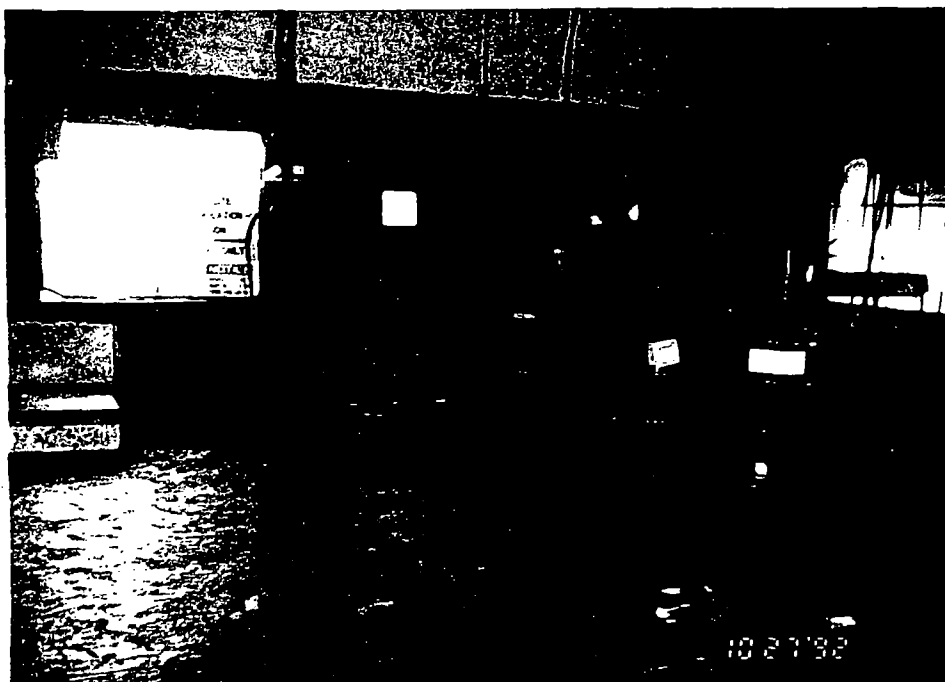
Photograph No. 13

Orientation: South

Description: Satellite Accumulation Area for waste solvent (F003, F005, D001, and D035)

Location: SWMU 6

Date: October 27, 1992



Photograph No. 14

Orientation: North

Description: Satellite Accumulation Area (center) for waste solvent (F003, F005, D001, and D035); note drum is moved due to construction activities; other drums do not contain waste

Location: SWMU 6

Date: October 27, 1992

ATTACHMENT B
VISUAL SITE INSPECTION FIELD NOTES

①
Alcon Polled Products Company

PA/VSJ - 10/27/92

OND 004 457 222

8:25 PRC on site; foggy; 45°F
Jack Brunner / PRC
Kristin Kirk /

Waiting to see Gray Truss

8:35 Met w/
Dale Allen
Gray Truss
W. Marvin Bell, Plant Manager

- Began operations after back in 1914
(WW I)

- Alcon bought the operations in mid 1960s (1965)

- from Bridgeport Brass Company, who had
10/27/92
①

②

purchased the facility from
"Natural Distillers", who operated
after Navy

- 2nd Alameda coil coating operator

- Coils - [coils] - 4 lines

- con. m
- levelled
- wash/paint w/ chrom. phosphate
- solution -- dip tank
- bake coating
- lubricate with - petroleum-
based lubricant (unharmful)
- slitting -- bad edges as to
specifications
- recoiled

- Phil Segrillo arrives - corporate
environmental

10/27/92
SB

③

- trying to get into the automotive industry --
2-pilot lines

- change w/ H₂O
- 2 H₂O lines
- painting w/ chrom. based
solution. Cast a "dip tank" --
applied via rollers)
- baked
- cooled
- recoiled

- another line for lubricator only

- USM #2 under roof

discharges to a combined sewer to the
Warren Municipal H₂O control
Department -- sampled weekly --
goes to Mahoning River
SB 10/27/92

④

- "Red run" -- storm sewer combines
up/sorting -- currently being
manipulated to separate (hanna)

- No discharge permit, but part of
OCPA-approved industrial program

- Family cooling H₂O towers -- now all
H₂O from City of Warren --
Mosquito Lake (a reservoir)
6-8 miles from facility

- Waste Streams:
Hazardous --

1) Wash paint, old paint/solvent/solvent paint

- (~4 drums/3 mo)

- F003/F005/D000/D035

- Xylene from MEX, ALBK

- idles on contg line

⑧ 10/17/92

③

- stored < 90 days in Stg. Bldg #21
(all hazardous waste) (11/7-1988)
- formerly in old dim story pool (only 1980s)
- 20' x 40'

- concrete pool

- no berm

- OHM Resource Recovery for fuel blending
Morrow, GA

2) Wash Solvent (Scrap KK)

- F003/F005/D000/D035

- ~80% MEX

- Paint drums -- washing equipment (pans)

- 2 SAA's --> #21

- Reclaimed by Hukill Chemical

Bedford, OH is returned to Alcon

- 40-50 drums/3 months

- 11/17 @ old pool before 1987

⑧ 10/17/92

⑥

③) Wild treatment study (F219) Monticello

- no chemical studies but no data
- Shipped off to Zonant Corp.
of Canton, OH - for LF
Zonant's best by then date
- from chem. publication
- 1/2" = 1/2" = 1/2" (study 1/2")
publication (Cov. 3)
- 20 yd box @ estate
- 20 yd / 1.5 wks
- taller pass - 1 yd box
- since 1989

④) Three 3 study - chem. team

study from research tanks &
total cat. time

- ~~2006/07~~ 2002/2007 p1142
- chemical → #21
- shipped off to OHM director → LF
- 20 yd / 1/4 (since 1989-1991)

⑦

⑤) Microtiltation System on Monticello

- sodium hydroxide
- when spent - water
- 2002 - 2007
- narrative (on-tim. only)
- OHM
- ⑥) West Carbon Technology - QC lab
check tube weights & shorts
(2001)
- OHM
- SAA @ Lab → #21
- 2 lbm / yr

⑦) West Side Solid Traps

OHM
drawn spent from solids,
but some wash codes
E003/E005/D001/D005
G001/D012

⑧

Nonhazardous

1) ~~Waste~~ CONTAINERS

- petroleum (mid 1980s)
- roller-applied concrete
- soap it gets dirty & dirty
- maintenance
- OHM for hls bleeding
- 24 drums / 1/4
- #21 Bldg

2) House start doing possible

- soap solution from cooking line
- sh-dye
- drummed - #21
- OHM
- 24 drums / 1/4 during tank element

3) Over ash - I can find work at ventilation

do not anticipate further generation

OHM

10/2/92

⑦

4) Used Oils

- Hydraulic oils
- Research Oil, Crystal, OH
- for tanks bleeding
- from building fund
- 55-gallon drums → #21
- pumped from drums (should
- off site - drums are
- sat to a recycler

Have

5) 1,1,1-TCA

- inventory element - disposed as a
- waste
- used in past as solvent, but no
- waste generated
- slip test site (?)
- OHM

10/2/92

(14)

(C) School VST & ST area (MER)

- Paint Mill building - currently upgrading
2 containers @ back looking for

Paint Mill Room
2 SAs

- paper splats in no photos in container
- floor down looks like some

Can ends only are coded

Empty drum storage area, ends & some (paul)
in the area

along South fence of hilly area PR
tracks

~ 150' x 40' asphalt area

storm sewer in area

around VST area used for industrial trucks
~ 40 yellow

(15)

- FC19 1/4 the collection

on a concrete area

- plastic lined steel barrel box
- stored underneath but near
top for transport

- Mottish Unit - contained within
beamed & treated area - splits
will be collected in a way
people to the ED tank

- Temporary storage tanks in this area direct
potential process

- West CCLY SAH & 6b
on fall at on concrete floor

- no floor drains
- closed w/ tunnel
- 55 gallon drum

(5) 1/2 1/2

(14)

(15)

- City colors gold color

- Seng Seng St. near cell cost

1 den of solnt

- closed w/ barrel

- on road - full of product

den's - 15. 1000 wire

- Back & front wire even less solnt

color as in the photo

- den has been moved

from S.H. due to

construction

- sing solnt

- app. contents of 1000 den bags

Division of

David & Alcon Aluma Corporation, a
wholly owned subsidiary of Alcon
Aluminum Limited of Montreal, Can

10/2/92

(12)

12:05 Finish belt tour / w/p of meeting

- Family of 4 in cell mill; arriving there as
staple in 1986

- Pat A. unit appears to be abt. 5
currently the only den store are
due to construction of new den
SO's thick rule - and to check on
this

- Aerial Photograph indicates store in
this area.

13:30 Back to lunch

10/2/92

12

Photo graph Log

#	Direction	Description
1	S	West oil drums in Building #21
2	S	Round H.W. area in Bldg #21
3	SW	Drums inside H.W. Area (21)
4	NW	Concrete Pad
5	NE	outside Building 21
6	N	Solvent vent - VST area
7	NE	Spill vent area for Tanker area
8	SE	Empty pallet drum area
9	SW	Casolin VST Area
10	SW	20 yd ³ FOM box
11	SW	Mantech System Tanks
12	E	Mantech Filter Press: 1st bldg.
13	SW	SAT - Cely
14	W	SAA solvent (filling)
15	S	SAA Paint Mkr Room
16	N	" " "

13:30

PRC Back @ facility
City of Lakeland, FL
H2O Pollution Control Dept.
2323 Main Ave SW
Lakeland, FL 34041
24841-2591

Across - ~ 26.5 ft. to facility

- No go into

- will send Building #21 dimensions

but cannot get area built

13:45

Wrap up meeting

14:15

PRC off-site

~~John Brown~~
01/20/12

W. Mervyn Bell
Plant Manager

Alcan Rolled Products Company
390 Griswold Street, NE
Warren, Ohio 44483
216/841-3416
Fax 216/841-3250



[Handwritten signature]
10/27/92